

REMARKS

Applicants respectfully traverse the rejections of the pending claims 2 – 9, 20, and 24 – 25. Consider claim 2, which recites a method of for emulating an erasable storage medium using a non-erasable optical disk including the step of “generating an updated system sector whenever there is a change in the data files stored on the writable area, wherein the updated system sector identifies only the changed data files, the unchanged data files being identified by the system sector.” Thus, the updated system sector must be combined with the system sector if a user wants to access both changed and unchanged data files – information for accessing changed data files being stored in the updated system sector whereas information for accessing unchanged data files being stored in the system sector. The resulting use of disk space is very efficient since the updated system sector need only store the information necessary for accessing the updated data files.

Applicants respectfully traverse the assertion that the Mikamo reference (USP 5,666,531) provides a teaching missing from the Flanagan reference regarding this advantageous provision for handling changes to data files stored on the writeable area. Specifically, Mikamo does not teach or suggest the generation of an updated system sector that “identifies only the changed data files” as recited in claim 2. Applicant readily admits, as set forth in Mikamo’s title, that Mikamo teaches the rewriting of only the changed information (data) portions. However, the corresponding “system sector” information is entirely rewritten for both the old and new sections. For example, consider Figure 3a and 3b in Mikamo. As set forth in the description of Figures, Figure 3a shows the “data position information” (which tells you location) for the old file on the optical disk whereas Figure 3b shows the “data position information” (again indicating track location) for the new file on the

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optical disk. Consider the positional information for "old.trk1." Because the corresponding data for this track has not been changed, the same positional information is stored in "old.trk1" in the new file shown in Figure 3b. BUT: see Col. 4, line 31 wherein Mikamo states

After all the revised records of the new file have been recorded on the optical memory card, said recording position information (see FIG. 3B) preserved on the main memory disk during the above mentioned process is recorded as the file management information in a vacant track 3a in the data record section 3 of the optical memory card 1.

In other words, the positional information for all the tracks shown in Figure 3b is recorded in vacant track 3a. Thus, Mikamo teaches away from the updated system sector recited in claim 2. Note that the updated system sector recited in claim 2 is efficiently limited to just the identification of updated files. In sharp contrast, Mikamo inefficiently provides an updated positional information for all the files every time a new track is written. As such, the method recited in claim 2 is patentable over the combination of the Flannagan and Mikamo references.

Moreover, as seen in Figure 4, note that Mikamo teaches that this positional information is recorded in the data section 3 not the directory section 2. As such, it teaches away from the method recited in claim 2, which requires the separation of system sector and data at separate ends of the spiral track.

Because claims 2 through 9 depend either directly or indirectly upon claim 2, they are patentable over these references for at least the same reasons.

Claim 20 is patentable for analogous reasons. Specifically, claim 20 is directed to a write-once read-many (WORM) optical disk including "an updated system sector for accessing only updated data files, the updated system sector being written in the writable area

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starting from the end of the system sector towards the data area along the spiral track, the information for accessing the data files that were not updated being stored in the system sector." As discussed above, neither the Mikamo nor the Flannagan reference disclose or suggest such a disk. Accordingly, claim 20 is patentable over these references. Claims 24 through 26 depend directly or indirectly upon claim 20 and are thus patentable for at least the same reasons as discussed with respect to claim 20.

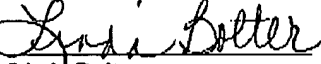
CONCLUSION

For the foregoing reasons, pending claims 2 - 9, 20, and 24 - 25 are in condition for allowance.

If there are any questions regarding any aspect of the application, please call the undersigned at 949-752-7040.

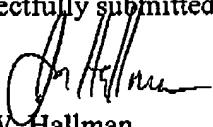
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Linda Bolter

July 23, 2004
Date of Signature

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